

Alli Stillman

Direct Dial: +1.212.906.1747

alli.stillman@lw.com

1271 Avenue of the Americas

New York, New York 10020-1401

Tel: +1.212.906.1200 Fax: +1.212.751.4864

www.lw.com

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June 25, 2024

VIA ECF

Honorable Jennifer L. Rochon
United States District Court
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Cengage Learning, Inc. et al. v. Google LLC, No. 1:24-cv-04274-JLR-BCM

Dear Judge Rochon:

We represent Defendant Google LLC (“Google”) in the above-captioned matter. Plaintiffs Cengage Learning, Inc.; Bedford, Freeman & Worth Publishing Group, LLC d/b/a Macmillan Learning; Macmillan Holdings, LLC; Elsevier Inc.; Elsevier B.V.; and McGraw Hill LLC (collectively “Plaintiffs”) filed the complaint (“Complaint”) in the above-captioned action on June 5, 2024. Dkt. No. 1. Plaintiffs served Google on June 6, 2024. Dkt. No. 13.

Google’s current deadline to move, answer, or otherwise respond to the Complaint is June 27, 2024. If Google moves to dismiss the Complaint, Plaintiffs must file any opposition by July 11, 2024, with Google’s reply due by July 18, 2024.

Google seeks an extension of time to respond to the Complaint; Plaintiffs consent to that extension and also request an extension of time to oppose any motion to dismiss. Subject to the Court’s approval, the parties have agreed on the following briefing schedule:

1. Google shall move, answer, or otherwise respond to the Complaint by August 26, 2024;
2. If Google moves to dismiss the Complaint, Plaintiffs must file any opposition by September 25, 2024; and
3. Google shall file a reply to any opposition made by Plaintiffs by October 9, 2024.

This is the first request for extension of time in this matter. We thank the Court for its consideration of this request.

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Sincerely,

/s/ Allison L. Stillman

Allison L. Stillman
of LATHAM & WATKINS LLP

cc: All Counsel of Record (via ECF)